## BEFORE THE POSTAL RATE COMMISSION

RECEIVED

OCT 10 11 08 AM 'OI

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

DOCKET NO. R2001-1

INTERROGATORY OF UNITED PARCEL SERVICE TO THE UNITED STATES POSTAL SERVICE (UPS/USPS-1) (October 10, 2001)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby files and serves the following interrogatory directed to the United States Postal Service: UPS/USPS-1.

Respectfully submitted,

John E. McKeever Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP 3400 Two Logan Square 18th & Arch Streets Philadelphia, PA 19103-2762 (215) 656-3300 (215) 656-3301 (FAX)

and

1200 19th Street, N.W. Washington, DC 20036

## INTERROGATORIES OF UNITED PARCEL SERVICE TO THE UNITED STATES POSTAL SERVICE

UPS/USPS-1. Refer to the Annual TFP Tables for GFY 1999, which were filed with the Postal Rate Commission on December 5, 2000.

- (a) Confirm that total "Advertising and Market Research" expenditures for 1999 were \$1,322,800,000. If not confirmed, please explain.
- (b) Describe in detail all of the types or categories of expenditures that are included in "Advertising and Market Research" and the expenses associated with each of those categories.
- (c) Provide a cross-walk of where the expenditures within "Advertising and Market Research" are recorded in the annual Cost Segments and Components report, and in what amounts these expenditures are assigned to individual Postal Service products and services.
- (d) What factors caused "Advertising and Market Research" costs to increase from just \$30.7 million in 1980 to \$1,322.8 million in 1999?

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I have caused to be served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Rules of Practice.

Phillip E. Wilson, Jr.

Dated: October 10, 2001

Philadelphia, PA

88955